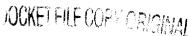
1401 H Street, N.W. Suite 1020 Washington, D.C. 20005 Office 202/326-3815



James K. Smith Director Federal Relations



March 19, 1998

EX PARTE OR LATE FILED

Ms. Magalie Roman Salas Secretary Federal Communications Commission 1919 M Street, NW Room 222 Washington, DC 20554

RECEIVED

MAR 1 9 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re:

Ex Parte Filing

CC Docket 97-213

Dear Ms. Salas:

On Wednesday, March 18, 1998, Mr. Don Auble, Ms. Barbara Kern and I met with Mr. Don Stockdale, Associate Bureau Chief, Common Carrier Bureau, Mr. Kent Nilsson, Deputy Chief, Network Services Division, Mr. David Ward, Network Services Division, and Mr. Charles Iseman, Mr. David Sylvar, Mr. Larry Petak and Mr. James Burtle of the Office of Engineering and Technology. The purpose of the meeting was to discuss the position taken by Ameritech in its pleadings filed in this proceeding as set forth in the attachment hereto.

Sincerely,

Attachment

cc:

D. Stockdale

K. Nilsson

D. Ward

C. Iseman

D. Sylvar

L. Petak

J. Burtle

FCC Notice of Proposed Rulemaking CC Docket No. 97-213



Ameritech 3/17/98

Extensions of Time

- Section 107 criteria
 - Availability of a standard, plus 24 months to implement
 - Complexity of requirements
 - Overdue Final Capacity Notice just available
- Solutions not available
 - Not one switch manufacturer will have a solution available for 10/25/98.
 - Network-based solutions are not available.

Internal Procedures

- Keep it simple
 - Procedures already exist
 - Affidavits from all employees unnecessary
- Reporting requirements to FBI
 - 2 hour response time for implementation too stringent
 - Ameritech accommodates need for exigent circumstances
 - Centralized Ameritech security operations are efficient

Internal Procedures

- Reporting requirements to FCC
 - Appropriate authorization is Court Order
 - No justification for reporting of unlawful wiretaps to FCC
 - No justification for differential treatment of carriers